

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

John Trenton Pendarvis,)
)
Plaintiff,)
)
v.)
)
Alan M. Wilson, Mark A Keel, Hugh E.)
Weathers, L.C. Knight, W. Jeffrey Young,)
Robert D. Cook, Emory Smith, Jr., Joanne)
Lee, David S. Jones, T. Stephen Lynch,)
Harley L. Kirkland, Wesley Vorberger,)
Robert Kittle, Adam Whitsett, Frank)
O’Neal, Jason Wells, Glenn Wood, John)
Neale, Rhett Holder, Alden G. Terry,)
Derek M. Underwood, J. Clint Leach,)
Aaron Wood, John Stokes, Vanessa)
Elsalah, Brittany Jeffcoat, Eva Moore,)
Ray Dixson, Frank Thompson, Robert)
Krutak, Jonathan Calore, Charlie Scrubbs)
and Wayne Eaddy,)
)
Defendants.)
_____)

Civil Action Number:
2:22-cv-03142-BHH-MHC

**RESPONSES TO LOCAL RULE 26.01
INTERROGATORIES ON BEHALF OF
DEFENDANTS ELSALAH, JEFFCOAT,
LEACH, MOORE, STOKES, TERRY,
UNDERWOOD, WEATHERS AND WOOD**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, as amended, Defendants Vanessa Elsalah, Brittany Jeffcoat, J. Clint Leach, Eva Moore, John Stokes, Alden G. Terry, Derek M. Underwood, Hugh E. Weathers and Aaron Wood hereby submit the below responses to interrogatories as required by the Court.

1. State the full name, address and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: These Defendants are not aware of any such interests.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: This action should be tried by jury in order to protect the rights of these Defendants.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: None of these Defendants is a publicly owned corporation.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This action is appropriate in the Charleston Division, as the events alleged in the Complaint occurred within the Charleston Division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: These Defendants are not aware of any related actions.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendant Terry's correct name is Alden Dalton, as Terry was her maiden name. If it is determined that an Amended Complaint is necessary to correct the caption, the undersigned counsel will accept service thereof.

The remainder of these Defendants are all correctly identified.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: These Defendants are not aware of any individual or entity who is liable to Plaintiff for the claims asserted in the Complaint.

Respectfully submitted,

DAVIDSON, WREN & DEMASTERS, P.A.

s/William H. Davidson, II
WILLIAM H. DAVIDSON, II (425)
1611 Devonshire Drive, 2nd Floor
Post Office Box 8568
Columbia, South Carolina 29202-8568
wdavidson@dml-law.com
T: 803-806-8222
F: 803-806-8855

*Counsel for Defendants Elsalah, Jeffcoat,
Leach, Moore, Stokes, Terry, Underwood,
Weathers and Wood*

Columbia, South Carolina
November 16, 2022